REMARKS:

Applicants would again like to call the Examiner's attention to the following two limitations in claim 25:

> a registration control that stores a selected one of the one or more blocks of received screen data in one of multiple memory areas each correlatable to any one of the at least one standby state;
>
> a correlation control that dynamically correlates the one of the multiple memory areas to a selected one of the at least one standby state;

The registration control stores screen data in a memory area. Please note that each memory area is correlatable to any one of the at least one standby state and that the correlation control is called to dynamically correlate the memory area with a standby state. For example, paragraphs 100-102 of the specification explain how the registration process is implemented in the embodiment. In the embodiment, site screen data is stored in a temporary waiting area in the RAM 120. If the user selects "register display screen," the site screen data is transferred from the temporary waiting area to a memory area (X0001) in the SRAM 135. At this point in time, the memory area X0001 is not correlated to any of the standby states (although the memory area is correlatable to a standby state). Please note that in the present invention, site screen data will never become ready for display in a standby state until the memory area that stores the site screen data is correlated to the standby state. Thus, when the site screen data is transferred to the memory area X0001, the site screen data is not ready for display.

To make the site screen data stored in the memory area X0001 ready for display, the claimed correlation process has to be performed. Paragraphs 106-111 of the specification describe an example of how to make the site screen data stored in the memory area X0001 ready for display. In the embodiment described in the specification, for example, the user is prompted to choose whether to make the site screen data stored in the memory area X0001 ready for display. If the user selects "set standby screen," the memory area X0001 is correlated to a standby state. Once the memory area X0001 is correlated to a particular standby state, the site screen data stored in the memory area X0001 becomes ready for display in the standby state.

There is nothing in Kuno et al. that discloses or teaches either: (1) the correlatable memory areas; or (2) the dynamic correlation process of the present invention. In Kuno et al., the image data is prestored in the memory area in the ROM 13 which is prefixedly linked to the standby state (and is therefore not correlatable). Since the link between the memory area and the standby state has been preestablished, the image data stored in the memory area is ready for display from the outset. In fact, in Kuno, the image data stored in the memory is ready for display without any dynamic correlation process and is just waiting to be read out from the memory for display.

In this regard, the Examiner takes the position that Kuno teaches the correlation process of the present invention because in Kuno, multiple images are selectively displayed. Applicants respectfully submit that the Examiner fails to discern between the process of memory correlation and the process of data read-out. The Kuno device is just reading out images from memory areas. One of ordinary skill in the computer art knows that the process of reading data from a memory includes selecting from the memory the particular memory area or areas that store the data. Please note that selection of the particular memory area is impossible unless the computer knows which memory area to select. The Kuno device or computer knows which memory area or areas to select for the standby state because the memory area or areas have been prefixedly linked to the standby state. In the present invention, however, when the site screen data is transferred to the memory area X0001, the memory area X0001 is not correlated to any standby state and cannot be selected for any standby state. It is the correlation process to make selection of the memory area possible for a standby state. The correlation process teaches the computer which memory area to select for a particular standby state.

Kuno is also silent about the dynamic correlation of the present invention. The correlation process of the present invention is dynamic because new images may be downloaded to memory areas which may be selectively correlated to a standby state. Therefore, the user of the present invention will never be bored with the same images because the user can download new images into memory areas and correlate any one of the memory areas to the standby state. In Kuno, since the images are prestored in memory areas in the ROM, and the memory areas are statically linked to the standby

state, the user of the Kuno terminal is confined within the prestored images and cannot add new images or replace the existing images with new images.

In this regard, Applicants would like to direct the Examiner's attention to the sentence in col. 10, lines 30-31 of Kuno et al., which reads, "In step S75, images stored in ROM (memory unit) 13 are selected by the control unit 12." It is important to distinguish between selection of images and correlation of memory areas. In Kuno, "images" can be selected because the control unit 12 knows the images stored and their locations (In Kuno, the images are prestored in the ROM memory areas, and the memory areas are statically linked to the standby state). In the present invention, the controller does not know what images are stored in memory areas because the images are downloaded and may be constantly replaced with new images. The controller does not even know which memory area to look to until the memory area is correlated to standby state.

The Examiner also takes the position that Kuno et al. and Evans et al. (US Patent No. 6,650,889) combined teach the present invention. Evans et al. discloses a local terminal that downloads graphic data through the Internet and stores the data therein with tags. The basic browsing function calls for downloaded data to be stored in a temporary memory for the viewing purpose. Evans et al. further stores the downloaded data in a permanent memory. The next time the same graphic data is to be downloaded, only the tag is downloaded, with which the local terminal retrieves the graphic data stored in the permanent memory and displays it. Thereby, downloading time can be saved.

First of all, there is no motivation to combine Kuno et al. and Evans et al. Kuno et al. teaches that all the images are stored in ROM. Therefore, Kuno teaches that the images are stored in a non-changeable memory so that the user cannot, and should not, change the images. In direct contrast to the teaching in Kuno, Evans et al. teaches downloading and storing image data. Thus, as a general matter, Kuno directly teaches against the combination with Evans. Moreover, the purpose of storing the downloaded data in the permanent memory in Evans is not to display the data but to prevent redundant downloading. For the purpose of the present invention, there is nothing

common between Kuno et al. and Evans et al. No one could be motivated to combine them to teach the subject matter of the present invention.

Even if Kuno et al. and Evans et al. could be properly combined, they would still fail to teach the present invention as claimed. There is nothing in Kuno et al. and Evans et al. that discloses or teaches the correlatable memory areas and the dynamic correlation between the memory areas to the standby state. Therefore, Kuno et al. and Evans et al., even combined, could not go beyond the teaching of Kuno et al. Under the teaching of Kuno et al., the user cannot display an image of his selection for a standby state. He is confined within the prestored images and cannot add new images or replace the existing images with new images.

Respectfully submitted,

Date: July 26, 2005

Tadashi Horie
Registration No. 40,437
Attorney for Applicant(s)

BRINKS HOFER GILSON & LIONE
P.O. Box 10395
Chicago, IL 60610
(312) 321-4200